

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: MICHAEL P. REYNOLDS, and KATHLEEN REYNOLDS, Debtors, STATE FARM BANK, F.S.B., Movant v. MICHAEL P. REYNOLDS, and KATHLEEN REYNOLDS, and WILLIAM C. MILLER, Ch. 13 Trustee, Respondents	Bankruptcy No. 15-19054-amc Chapter 13 Related to Doc. No. 30
---	---

NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE

State Farm Bank, F.S.B., has filed a Motion for Relief from the Automatic Stay with the Court to lift the automatic stay regarding the 2010 Jeep Compass Utility 4D Limited 4WD 2.4L I4, VIN 1J4NF5FBXAD512220.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **August 9, 2016**, you or your attorney must do all of the following:

(a) file an answer explaining your position at:

Clerk, U.S. Bankruptcy Court
Eastern District of Pennsylvania
Robert N.C. Nix, Sr. Federal Courthouse
900 Market Street, Suite 400
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorneys:

Peter J. Ashcroft, Esquire
Bernstein-Burkley, P.C.
707 Grant Street, Suite 2200, Gulf Tower
Pittsburgh, PA 15219

2. If you or your attorney do not take these steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Ashely M. Chan, Judge, on **August 23, 2016 at 11:00 a.m.** in the Robert N.C. Nix, Sr. Federal Courthouse, 900 Market Street, Courtroom #5, Philadelphia PA 19107.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

By: /s/ Peter J. Ashcroft
Peter J. Ashcroft, Esq.
PA I.D. #87317
pashcroft@bernsteinlaw.com
707 Grant Street, Suite 2200, Gulf Tower
Pittsburgh, PA 15219
(412) 456-8107
Fax: (412) 456-8135

Counsel for State Farm Bank, F.S.B.

Dated: July 25, 2016